

TEXAS DEPARTMENT OF WATER RESOURCES  
Industrial Solid Waste Disposal Compliance Monitoring Inspection

RECEIVED  
Major  
1-20-82  
FEB 04 '82  
ENFORCEMENT AND  
FIELD OPERATIONS

Inspection Cover Sheet (see reverse side for checklist use and general instructions)

Compliant ☒

Texas Permit/Reg. No. 30092

Noncompliant ☐ (explain by separate memo)

EPA I.D. No. TXD082688979

Site Operator Information:

9046652

Name of Company Arco Petroleum Products, Co.

Company's Address P.O. Box 2451

Houston, Tx. 77001

Site Address 12000 Lawndale

Houston, Tx. 77001

County Harris

Type of Industry petroleum refining & petrochemical production

Indicate below Classes of Waste managed (Hazardous-H, Class I nonhazardous-NH, Class II-II).

Generator H, NH, II Transporter \_\_\_\_\_

Treatment \_\_\_\_\_ Storage H, NH

Disposal H, NH, II SUPERFUND FILE

Site Information (T.S.D. facilities only)

JAN 29 1993

1. Are facilities located outside the 100 year flood plain area?

Yes ☒ No ☐

REORGANIZED

2. Describe land use within one mile industrial/commercial/residential

Inspection Information:

1. Inspectors Name & Title Susan Ripley, Field Rep. Phone No. 479-5981

2. Inspection Date: January 26, 1982

3. Inspection Participants: J.T. Adams, mgr. - envir. Phone No. 475-4111

& energy conservation

Approved: Merton Coloton  
District Supervisor

Signed: Susan Ripley  
Inspector

Date: January 29, 1982

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INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report  
Generators Checklist

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ENFORCEMENT AND  
FIELD OPERATIONS

Section A - Manifest

1. Does generator dispose of (hazardous and/or non-hazardous) waste on-site only?
 

Hazardous	Yes	No <input checked="" type="checkbox"/>
Non-Hazardous	Yes	No <input checked="" type="checkbox"/>

  - a. If yes, do not fill out rest of Sections A and D.
  - b. If no, identify primary off-site facility(s). Use comments sheet or add registration waste list properly annotated.
2. Is the generator required to use a TDWR manifest shipping control ticket (Rule 156.22.01.110(a)?
 

Yes <input checked="" type="checkbox"/>	No
---	----

  - a. If yes, is manifest properly completed?
 

Yes <input checked="" type="checkbox"/>	No
---	----
  - b. If no, explain in comments sheet.
  - c. Does the generator receive return (white) copy of shipping control ticket?
 

Yes <input checked="" type="checkbox"/>	No
---	----
  - \*d. Is generator a small quantity generator?
 

Yes	No <input checked="" type="checkbox"/>
-----	--

NOTE: If 2d is yes, over 90-day storage without a permit is allowed.

Section B

1. Does the generator have any closed or abandoned facilities?
 

Yes <input checked="" type="checkbox"/>	No
---	----

  - \*\*a. If yes, explain in comments sheet.

Section C - Hazardous Waste Determination (Rule 156.22.01.106(e) & 156.22.06.002)

1. Does generator generate solid waste(s) listed in Part 261, Subpart D (List of Hazardous Waste)?
 

Yes <input checked="" type="checkbox"/>	No
---	----
2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity)
 

Yes <input checked="" type="checkbox"/>	No
---	----

  - a. Does generator determine characteristics by testing or by applying knowledge of processes? both but mostly applying knowl of proc

Yes <input checked="" type="checkbox"/>	No
---	----

    - (1) If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)?
    - (2) If equivalent test methods used, attach copy of equivalent methods used.

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\*(Changed A-2, a-d, resequenced order; 5/8/81)

\*\*Indicates checklist questions which should be noted or completed at the time of an on-site inspection.)

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3. Is notification of waste stream changes current?  
(Rule 156.22.01.106(c))

Yes \_\_\_ No ☒

a. If no, explain in comments sheet.

4. Is any Class I non-hazardous Class II or PCB (storage) solid wastes generated?

Yes ☒ No \_\_\_

a. Did the generator test all wastes to determine non-hazardous characteristics?

Yes \_\_\_ No ☒

(1) If no, list wastes deemed non-hazardous or processes from which non-hazardous waste was produced. (Use xerox of registered material or add to comments sheet.)

Section D - Pre-Transport Requirements (Rule 156.22.06.005-009)

(According to J.T. Adams)  
Name, owner/operator/manager

1. Does owner/operator package waste for shipment?

Yes \_\_\_ No ☒

\*a. If yes, complete this section, if no, go on to Section E (however see Notes, pp. 5).

2. Is generator familiar with 49CFR 173, 178 & 179 (DOT) requirements?

Yes \_\_\_ No \_\_\_

\*\*3. Does generator appear to have standard procedures for packaging labeling and marking of hazardous waste?

Yes \_\_\_ No \_\_\_

\*\*4. Does the generator mark each package in accordance with 49CFR 172?

Yes \_\_\_ No \_\_\_

\*\*5. Is each container of 110 gallons or less marked with the following label (49CFR 172-304)?

Yes \_\_\_ No \_\_\_

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address \_\_\_\_\_

Manifest Document Number \_\_\_\_\_

6. Accumulation Time - (May accumulate hazardous waste for up to 90 days without a permit provided; see Rule 156.22.06.009).

a. Is the generator a permitted storage facility?

Yes \_\_\_ No ☒

b. Are containers used to temporarily store waste before transport?

Yes ☒ No \_\_\_

\*\* (1) If yes, is each container clearly dated?  
Also, fill out rest of No. 6 (Accumulation Time)

Yes ☒ No \_\_\_

PCB's  
asbestos  
mercury

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\*(Changed 5/8/81, added to 1a; 6/2/81, added to C,4)

\*\*(See note, Page 3)

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## INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report  
Facilities Checklist - Rule 156.22.01.102 and 156.22.08.001-008

ENFORCEMENT AND  
FIELD OPERATIONSSection A - General Facility Standards

1. Has proof of deed recordation of on-site disposal facilities been provided to the agency?  
(Rule 156.22.01.105, for hazardous waste see Rule 156.22.13.010) Note: Not required for Waste Disposal Well.  
Yes ☒ No ☐
- a. If no, explain in comments sheet.
- \*\*2. Has any evidence of spills or unauthorized discharge(s) been observed/reported (Rule 156.22.01.104)?  
Yes ☐ No ☒
- a. If yes, explain in comments sheet.
3. NOTE: A sketch of facilities, general site orientation showing landfills, surface impoundments, injection wells, drainage routes, water bodies/courses and other pertinent features (Separate sketch or diagrams of landfill(s) etc.) should be attached to this and other facility checklist(s).
- NOTE: For all non-hazardous and non-commercial facilities do not complete the remainder of this Facilities Checklist. Proceed to specific type facility checklists and complete one checklist for each disposal facility or multi-comments on a single checklist.
4. Has facility received hazardous waste from a foreign source (Rule 156.22.08.003)?  
Yes ☐ No ☒
- a. If yes, has he filed a notice at least 4 weeks in advance to receipt with the Executive Director and the Reg. Admin.?  
Yes ☐ No ☐
- (1) If no, explain in comments sheet.

Section B - Waste Analysis - Rule 156.22.08.004

1. Does facility have a waste analysis plan?  
Yes ☒ No ☐
- a. If yes, is it maintained at the facility?  
Yes ☒ No ☐
- b. Does the waste plan include the following?
- (1) Parameters for which each waste will be analyzed?  
Yes ☒ No ☐
- (2) Test methods used to test for these parameters?  
Yes ☒ No ☐
- (3) Sampling method used to obtain sample?  
Yes ☒ No ☐

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(Changed 6/2/81, added Note to A-1)

\*\* (Note; Indicates checklist questions which should be noted or completed at the time of an on-site inspection.

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(4) Frequency with which the initial analysis will be reviewed or repeated?

Yes ☒ No ☐

(a) If yes, does it include requirement to repeat whenever wastestream or process(s) is changed?

Yes ☒ No ☐

(5) (For off-site facilities) Waste analyses that generators have agreed to supply?

Yes ☐ No ☐

(6) (For off-site facilities) Procedures which are used to inspect and analyze each movement of hazardous waste including:

(a) Procedures to be used to determine the identity of each movement of waste?

Yes ☐ No ☐

(b) Sampling method to be used to obtain representative sample of the waste to be identified?

Yes ☐ No ☐

(c) If the answers to 1, 1a or 1b(1)-(6) is no, explain in comments sheet or attach corrective action letter to facility.

N/A  
↓

\*\*2. Does the facility provide adequate security through (Rule 156.22.08.005):

(a) 24-hour surveillance system? (e.g. television monitoring or guards)

Yes ☒ No ☐

OR

(b) (1) Artificial or natural barrier around facility (e.g. fence or fence and cliff)?

Yes ☒ No ☐

Describe Facility is totally fenced except for boundary along Ship Channel.

(2) Means to control entry through entrances (e.g. attendant, television monitors, locked entrance, controlled roadway access)?

Yes ☒ No ☐

Describe guards present 24 hours; barriers across entrance roads

\*\*3. Does the facility have a sign with the legend "Danger - Unauthorized Personnel Keep Out"

(Rule 156.22.08.005(c) unless exempt under Subsections (a) (1) and (a) (2))?

Yes ☒ No ☐

a. Unless exempt, if no, explain in comments sheet.

Section C - General Inspection Requirements - Rule 156.22.08.006

1. Does facility have a written inspection schedule (and plan)? Yes ☒ No ☐
- (a) If yes, is the schedule maintained at the facility? Yes ☒ No ☐
- (b) Does the inspection schedule (plan) provide for inspecting the following:
- (1) Monitoring equipment? Yes ☒ No ☐
- (2) Safety and emergency equipment? Yes ☒ No ☐
- (3) Security devices? Yes ☒ No ☐
- (4) Operating and structural equipment? Yes ☒ No ☐
- (5) Does the schedule or plan identify the types of problems to be looked for during inspection:
- (a) Malfunctions and deterioration? Yes ☒ No ☐
- (b) Operator error? Yes ☒ No ☐
- (c) Discharges or threat of discharges? Yes ☒ No ☐
2. Does the owner/operator maintain an inspection log? Yes ☒ No ☐
- a. If yes, does it include:
- (1) Date and time of inspection? Yes ☒ No ☐
- (2) Name of inspector? Yes ☒ No ☐
- (3) Notation of observations? Yes ☒ No ☐
- (4) Date and nature of repairs or remedial action? Yes ☒ No ☐
- \*\*b. Are there any malfunctions or other deficiencies noted in the inspection log that remain uncorrected? Yes ☐ No ☒
- c. Are the inspection log records maintained for 3 years? Yes ☒ No ☐
3. If the answers to 1, 1a, 1b(1)-(5), 2, 2a(1)-(4), or 2c, is no, explain in the comments sheet or attach a copy of the corrective action letter sent to the facility. If for 2b the answer is yes, explain in comments sheet.

Section D - Personnel Training - Rule 156.22.08.007

1. Does the owner/operator maintain Personnel Training Records at the facility?

Yes ☒ No ☐

How long are they kept? 15 years  
(Current personnel - for the life of site; former employees - for 3 years)

- a. If yes, do they include:

(1) Job Title and written job description of each position?

Yes ☒ No ☐

(2) Description of type and amount of training?

Yes ☒ No ☐

(3) Records of training given to facility personnel?

Yes ☒ No ☐

- b. If the answers to 1, 1a(1)-(3) is no, explain in the comments sheet or attach a copy of the corrective action letter sent to the facility.

Section E - Requirements for Ignitable, Reactive or Incompatible Waste - Rule 156.22.08.008

1. Does facility store or dispose of ignitable and/or reactive wastes (if no, go on to Section F)?

Yes ☐ No ☒

- a. Is the owner/operator familiar with proper separation and safeguards needed to prevent ignition or reaction of ignitable or reactive waste? (Reference - see also Appendix IV of Rule 156.22.05)

(1) Use comments sheet to describe separation and confinement procedures.

(2) Use comments sheet to describe any potential sources of ignition or reaction.

- b. Are smoking and open flame confined to specifically designated locations?

Yes ☒ No ☐

- \*\*c. Are "No Smoking" signs posted in hazardous areas?

Yes ☒ No ☐

- d. If answer(s) to 1b or 1c are no, explain in comments sheet.

2. Inspect containers:

- \*\*a. Are containers leaking, bulging, or corroding?

Yes ☐ No ☒

- b. If yes, explain in comments sheet.

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(Changed 6/2/81, changed wording E-2)

\*\* (See note, Page 7)

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Section F - Preparedness and Prevention - Rule 156.22.09.001-.007

- \*\*1. Is there evidence of fire, explosion, or contamination of the environment? Yes \_\_\_ No ☒
- a. If yes, use comments sheet to explain.
2. Is the facility equipped with:
- a. Internal communication or alarm system? Yes ☒ No \_\_\_
- \*\* (1) Is it easily accessible in case of emergency? Yes ☒ No \_\_\_
- b. Telephone or two-way radio to call emergency response personnel? Yes ☒ No \_\_\_
- \*\*c. Portable fire extinguishers, fire control equipment spill control equipment and decontamination equipment? Yes ☒ No \_\_\_
- (1) Is this equipment tested to assure its proper operation? Yes ☒ No \_\_\_
- d. Water of adequate volume for hoses, sprinklers or water spray system? Yes ☒ No \_\_\_
- (1) Source of Water: Trinity River (CIWA), Ship Channel
- (2) Pumping or delivery rate: 17,000 gpm
- \*\*3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? Yes ☒ No \_\_\_
4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) Yes ☒ No \_\_\_
5. In the case that more than one police and fire department might respond, is there a designated primary authority? Yes ☒ No \_\_\_
- a. If yes, list primary authority Arco
6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ☒ No \_\_\_
- a. Are they readily available to the emergency coordinator? Yes ☒ No \_\_\_
7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? Yes \_\_\_ No ☒

on-site dispensary  
has 1 doctor and 2  
nurses on duty; on-s  
ambulances, also

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\*\* (See note, Page 7)

ATTACHMENT



8. Have State or local authorities declined to enter into arrangements 4-7 above?

Yes \_\_\_ No ☒

a. If yes, does the operating record indicate this?

Yes \_\_\_ No N/A

Section G - Contingency Plan & Emergency Procedures - Rule 156.22.10.001-.007

1. Is there a contingency plan?

Yes ☒ No \_\_\_

a. If yes, is it maintained at the facility?

Yes ☒ No \_\_\_

b. If yes, is it a revised SPCC Plan?

Yes ☒ No \_\_\_

2. Is there an emergency coordinator on-site or on call at all times?

Yes ☒ No \_\_\_

3. If answer is no to any or all of Section F 2-7 and G, explain in comments sheet.

Section H - Manifest System, Recordkeeping & Reporting - Rule 156.22.11.001-.007

1. Does facility receive waste from off-site?

Yes \_\_\_ No ☒

a. If yes, does the owner/operator comply with manifest requirements?

Yes \_\_\_ No N/A

b. If 1 is no, go on to question 4 below.

2. Does the facility receive any waste from a rail or water (bulk shipment) transport?

Yes \_\_\_ No \_\_\_

a. If yes, is it accompanied by a properly executed shipping paper?

Yes \_\_\_ No \_\_\_

3. Has the owner/operator received any shipments of waste which were inconsistent with the manifest?

Yes \_\_\_ No \_\_\_

a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter?

Yes \_\_\_ No \_\_\_

\*4. Does the owner/operator keep a written operating record at the facility (Rule 156.22.11.003)?

Yes ☒ No \_\_\_

a. Does the operating record reflect the following:

(1) Description, quantity of each hazardous waste received and method(s) and date of T.S.D. at the facility?

Yes ☒ No \_\_\_

(2) Location and quantity of each hazardous waste within the facility (for disposal facilities quantity on a map or diagram of each cell or disposal area, for all facilities cross-reference to shipping ticket Nos.)?

Yes ☒ No \_\_\_

\*NOTE: This question applies to all Hazardous Waste Generators, including on-site facilities.

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(changed 10/14/81, added note to question 4.)

\*\* (See note, Page 7)

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(3) Records and results of waste analyses and trial tests?

Yes ☒ No ☐

(4) Summary Reports of all incidents that require implementing the contingency plan?

Yes ☐ No ☒ N/A

(5) Closure cost estimates for all facilities.  
(Rule 156.22.14.002)

Yes ☒ No ☐

(6) Post closure cost estimates for disposal facilities. (Rule 156.22.14.003)

Yes ☒ No ☐

b. If no for Section H, 1-3a, & 4 all, explain in comments sheet.

5. Does the owner/operator maintain a closure plan for all facilities (Rule 156.22.13.001-006)?

Yes ☒ No ☐

a. If no, explain in comments sheet.

6. Does the owner/operator maintain a post closure plan for disposal facilities (Rule 156.22.13.007-010)?

Yes ☒ No ☐

a. If no, explain in comments sheet.

7. Do records indicate that the facility received any waste not accompanied by a manifest (Rule 156.22.01.115(a) and (b) (for facilities receiving from off-site only)?

Yes ☐ No ☒

a. If yes, has he submitted an unmanifested waste report to the Executive Director (Rule 156.22.01.115(c) and 156.22.11.006)?

Yes ☐ No ☒ N/A

(1) If no, explain in comments sheet.

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(Changed 6/2/81, added to 6; also on 6/18/81 made 2 questions of 5 and added reference to 7)

**ATTACHMENT**

Date Jan 29, 1982

Reg./Permit No. 30092

INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report

COMMENTS SHEET

SECTION: A - Manifest Paragraph: 1b

Off-site disposal facilities used are Chemical  
Waste Management and Rollins.

SECTION: B Paragraph: 1a

Two closed landfills are present on site.  
Grass has been planted on them, and they  
are restricted access areas with 'Keep Out'  
signs posted. Locations are noted on accompanying  
map.

SECTION: C Paragraph: 3a

According to the registration dated 8-18-81, landfills,  
a pit, and impoundment basins were listed as  
active on-site disposal facilities. ~~The land~~ These  
are no longer active. Mr. J. T. Adams is in the  
process of correcting and updating the registration.

ATTACHMENT

Checklist \_\_\_\_\_  
(attach, to correct checkl

Date Jan. 29, 1982

Reg./Permit No. 30092

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ENFORCEMENT AND  
FIELD OPERATIONS

INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report

COMMENTS SHEET

SECTION: C Paragraph: 4a

All wastes not classified as Class I ~~were~~<sup>are</sup> tested  
each time a tank ~~was~~ is cleaned out and before  
the wastes are landfarmed.

SECTION: D Paragraph: 7

Drum storage area is fenced in, curbed, with  
sump. It is located inside a warehouse.

SECTION: G Paragraph: 1

As described in the comments sheet for section  
C there are no longer any active landfills, pits,  
or impoundments. The company is in the process  
of updating there registration.

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## INDUSTRIAL SOLID WASTE

Compliance Monitoring Inspection Report  
 Land Treatment Checklist (Rule 156.22.19.001-.009)

ENFORCEMENT AND  
 FIELD OPERATIONS  
 Class of Waste

- \*\*1. Is run-on diverted away from the land treatment facility? (Effective 11/19/81) Yes \_\_\_ No ☒
- \*\*2. Is run-off from the land treatment facility collected? (Effective 11/19/81). Yes ☒ No \_\_\_
3. Is the run-off analyzed to see if it is a hazardous waste? Yes ☒ No \_\_\_
- a. If the run-off is considered hazardous, how is it handled? (Use narrative explanations sheet). *See comments*
- b. If it is not a hazardous waste, is it discharged through a point source to surface waters? Yes \_\_\_ No ☒
- (1) If Yes, list WQ Permit No. \_\_\_\_\_

4. What hazardous wastes are treated at the land treatment facility? *tank bottoms*

*API separator bottoms*

## Subpart D Listed Wastes

## Characteristic Wastes (EP Toxicity)

*API separator bottoms*  
*leaded tank bottoms*

- a. For those listed wastes, were analyses done to determine the concentrations of those constituents which caused the waste to be listed? Yes ☒ No \_\_\_

- (1) If Yes, what are these concentrations? (Use narrative explanation sheet). *data not available*

- b. For those characteristic wastes (EP) Toxicity, what are the concentrations of the following:

*after land farming*

	<i>leachate</i> Concentration (mg/l)
Arsenic	2.01
Barium	2.4
Cadmium	2.005
Chromium	2.03
Lead	2.05
Mercury	2.2
Selenium	2.01
Silver	2.02
Endrin	2.02

## Waste

*Soils w/ waste*

chr	190
Pb	360

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\*\*See Note on Page 1

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Concentration (Mg/l)

Waste

Lindane  
Methoxychlor  
Toxaphene  
2,4 D  
2,4,5-TP Silvex

soils w/ waste  
2.4  
2.1  
2.5  
2.1  
2.1

5. Are food chain crops grown?

Yes ☐ No ☒

a. If yes, what are the concentrations of the following in the soil and vegetation.

Soil  
Concentration (mg/l)

Vegetation  
Concentration (mg/l)

Arsenic  
Cadmium  
Lead  
Mercury

N/A

b. Did the facility notify the Executive Director that he is growing food chain crops?

Yes ☐ No ☐ N/A

c. Is the following information kept at the facility:

(1) Tests for the specific wastes and application rates being used at the facility?

Yes ☐ No ☐

(2) Crop characteristics?

Yes ☐ No ☐

(3) Soil characteristics?

Yes ☐ No ☐

(4) Sample selection criteria?

Yes ☐ No ☐

(5) Sample size determination?

Yes ☐ No ☐

(6) Analytical methods used?

Yes ☐ No ☐

(7) Statistical procedures?

Yes ☐ No ☐

d. Does the facility treat waste that contains cadmium?

Yes ☐ No ☒

(1) If no, do not fill out (2) and (3).

(2) If yes, was the pH of the soil and waste mixture 6.5 or greater at the time of each waste application?

Yes ☐ No ☐ N/A

(a) If the pH was less than 6.5, did the waste contain cadmium concentrations of 2 mg/Kg or less?

Yes ☐ No ☐

(3) Is the annual application rate of cadmium less than 0.5 Kg/ha (Kilograms per hectare) for the following tobacco, leafy vegetables, or root crops grown for human consumption:

Yes ☐ No ☐

(a) For all other food chain crops, is the annual cadmium application rate less than 2.0 Kg/ha (until 6/30/84)

Yes ☐ No ☐

6. Is an unsaturated zone monitoring plan kept at the facility:

Yes ☒ No ☐

a. Does the plan include:

(1) Soil monitoring?

Yes ☒ No ☐

(2) Soil pore water monitoring?

Yes ☒ No ☐

(3) Sample depths below waste incorporation?

Yes ☒ No ☐

(4) Number of samples to be taken?

Yes ☒ No ☐

(5) Frequency and time of sampling?

Yes ☒ No ☐

(6) Analysis of samples?

Yes ☒ No ☐

7. Are records kept at the facility of:

a. Application dates?

Yes ☒ No ☐

b. Application rates?

Yes ☒ No ☐

c. Quantities?

Yes ☒ No ☐

d. Waste location?

Yes ☒ No ☐

8. Is a copy of the closure (effective immediately) and post-closure plan (effective 11/19/81) kept at the facility?

Yes ☒ No ☐

9. Are ignitable or reactive wastes placed in the facility?

Yes ☐ No ☒

\*\*a. If yes, are the wastes treated, rendered or mixed before or immediately after placement in the landfarm so it is no longer reactive or ignitable?

Yes ☐ No ☒ N/A

b. Attach a copy of treatment description.

10. Are incompatible wastes placed in the facility?

Yes ☐ No ☒

\*\*a. Are the incompatible waste placed in different locations in the facility?

Yes ☐ No ☒ N/A

11. Are monitor wells required for this site? (Refer to Rule 156.22.12.001-.005 - Ground Water Monitoring)

Yes ☒ No ☐

a. Has owner/operator installed, operated and maintained a ground water monitoring system (unless waived) prior to 11/19/81?

Yes ☒ No ☐

NOTE 1: Attach Ground Water Monitoring Report if answer to question 11 is yes.

NOTE 2: If the answer is no for Nos. 3, 5c(1)-(7), 6, 6a(1)-(6), 7a-d, 8, 9a, 10a, and after 11/19/81; 1, 2, 11b and 12, explain in comments sheet.

12. Describe landfarm(s) site and indicate plat map, location(s), and designation(s).

Also describe each landfarm(s) dimensions: Sites are shown on attached map; landfarms are areas surrounding oil tanks within fire walls

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(Changed 10/1/81, question 11 revised, 12 deleted, 13 renumbered)

**ATTACHMENT**



Date Jan. 29, 1982

INDUSTRIAL SOLID WASTE

Reg./Permit No. 30092

Compliance Monitoring Inspection Report

COMMENTS | SHEET

SECTION: \_\_\_\_\_ Paragraph: 3.2.

The run-off is collected in basins and  
analyzed before sent to Gulf Coast Waste  
Disposal.

SECTION: \_\_\_\_\_ Paragraph: \_\_\_\_\_

SECTION: \_\_\_\_\_ Paragraph: \_\_\_\_\_

**ATTACHMENT**

## INDUSTRIAL SOLID WASTE

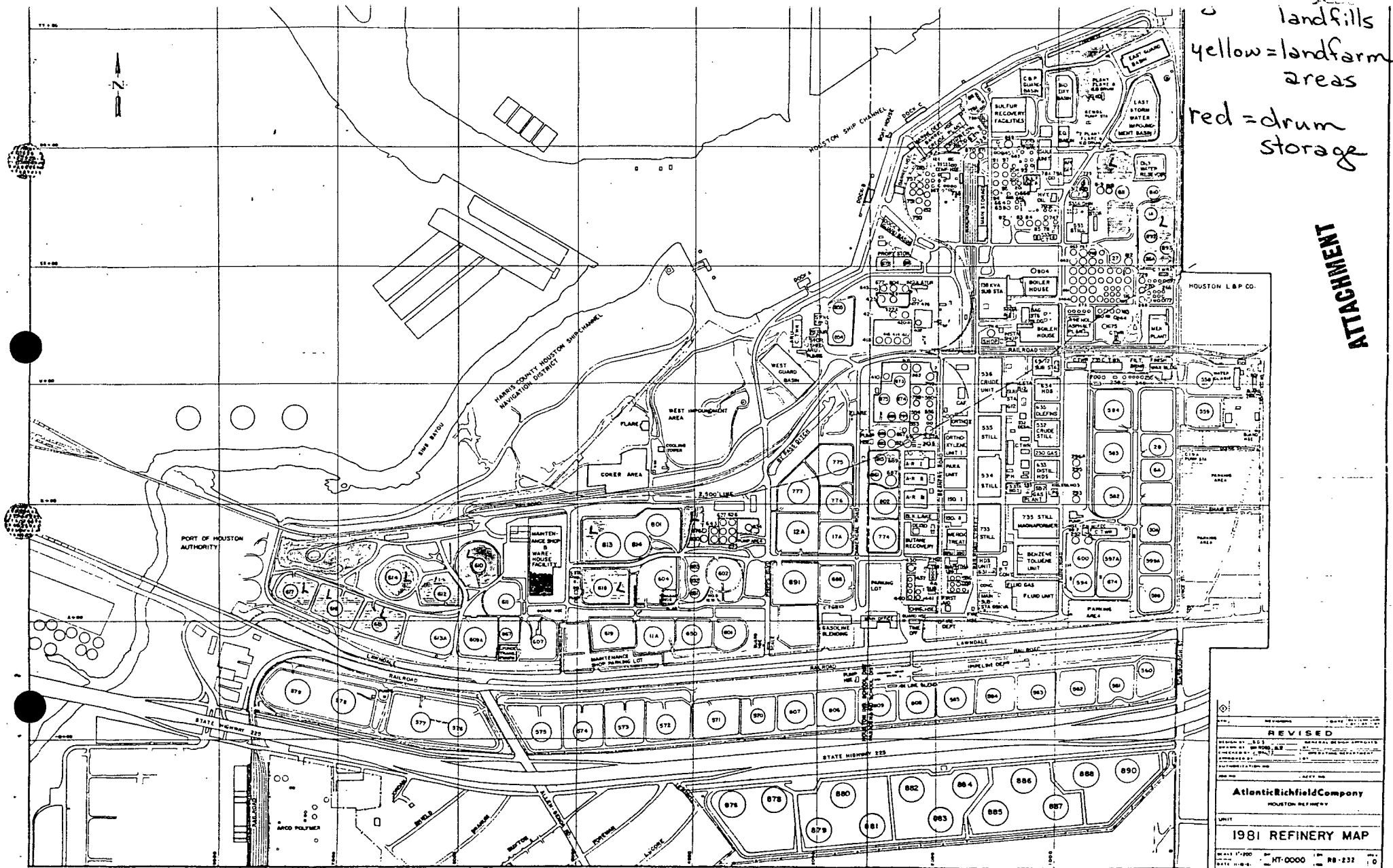
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FEB 04 '82

Compliance Monitoring Inspection Report  
Ground Water Monitoring Program (Rule 156.22.12.001-.005) **ENFORCEMENT AND**  
**FIELD OPERATIONS**

1. Specify the site(s) for which a ground water monitoring system (has) or (should have) been installed: landfills
2. What date was the monitoring program initiated (date of first sampling)?  
Sept. 1981
3. Indicate by a map or sketch locations of each monitoring well and distance from active site(s) (attach). Also list depths, diameter and completion data on each well (or include well drilling and completion report). see attached report
4. If no ground water monitoring system has been installed, include a copy of Low Potential Ground Water Demonstration used to document a low potential for migration of hazardous waste or constituents. Also, describe briefly what basis was used to justify the waiver of monitoring requirements: \_\_\_\_\_
5. If a ground water monitoring system has been installed, attach a copy of the ground water sampling and analysis plan. Briefly describe sample collection technique for obtaining samples and the method used to establish elevation of ground water for ground water monitoring wells: wells sampled by pumping 5 times, then sinker bottle is used to collect sample. ground water is very high in this area so when wells were drilled ground water was found.
6. Attach a copy of the most recent Annual Report (if available).
7. Is a Ground Water Quality Assessment Plan maintained at the facility?  
Yes ☒ No ☐ N/A ☐
8. If the answer to question 2 or 7 indicates noncompliance with Subchapter 12, if the corrective action letter sent to the facility operator does not explain the problem, explain in the comments sheet or by separate I.O.M.

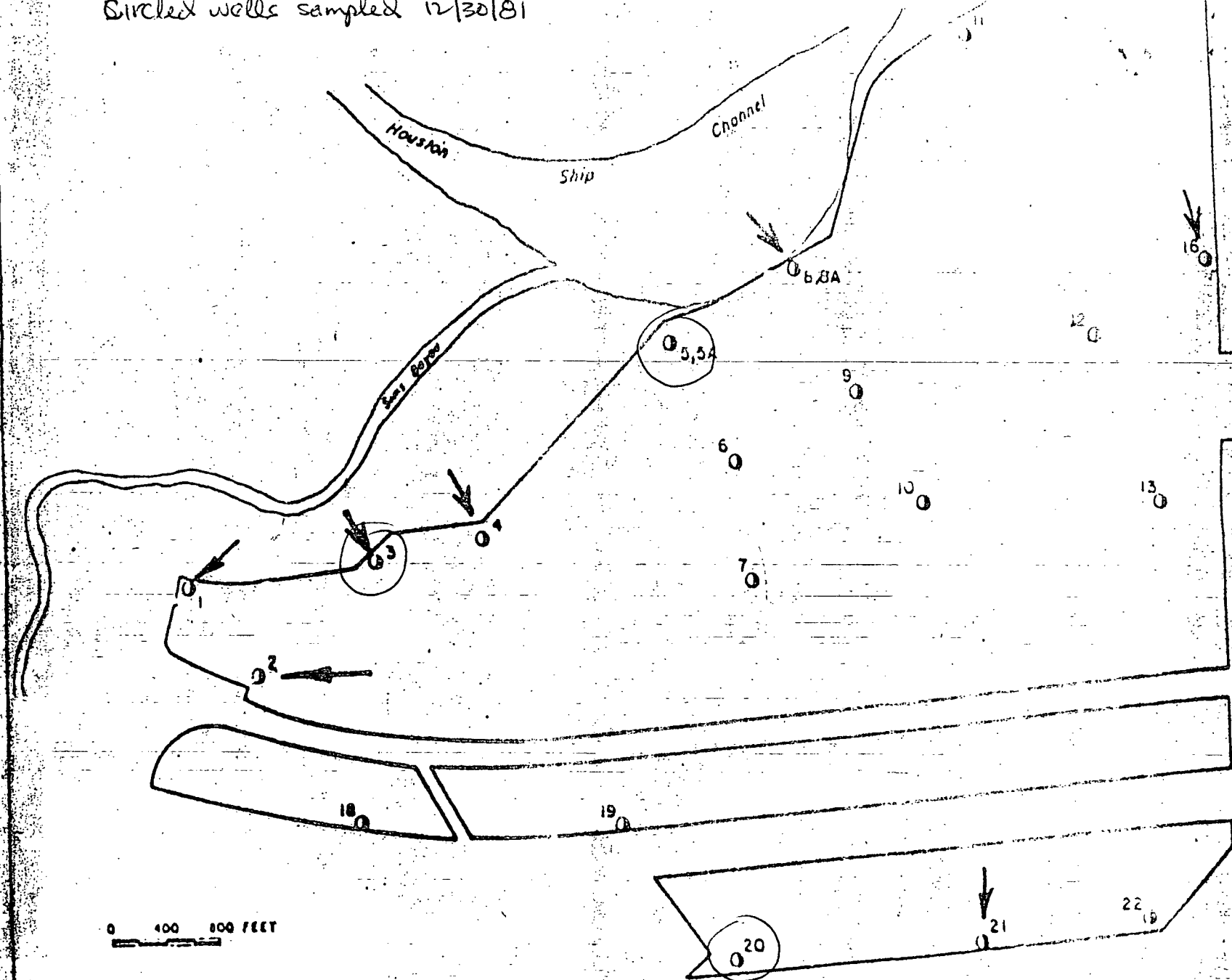
ATTACHMENT



EXPLANATION

- PROPOSED MONITOR WELL LOCATIONS

Circled wells sampled 12/30/81



ATTACHMENT

RC2A  
12/2/81

ATTACHMENT

ARCO REFINING  
PRELIMINARY SAMPLING DATA

<u>SAMPLE</u>	<u>WELL #</u>	<u>DATE COLLECTED</u>	<u>DEPTH TO WATER (FT)</u>	<u>TEMP CO</u>	<u>pH</u>	<u>SPEC. COND. UMHOS</u>	<u>TOC MG/L</u>	<u>BASE NEUTRAL EXTRACTABLES</u>
PS-1	21	11/6/81	10.03	25	7.5	2700	9	ND < 5PPB
PS-2	1	11/6/81	14.63	26.5	7.1	900	51	ND < 5PPB
PS-3	14	11/6/81	8.10	28	6.5	3500	<u>95</u>	IN THE RANGE OF OF 5-30PPB ETHYL PYRIDINE PROPYL PYRIDINE PROPIONYL BENZEN METHYL NAPHTYLEN
PS-4	4	11/6/81	15.95	28	7.3	1300	31	< 5PPB W/TRACES OF METHYL NAPHTYLEN
PS-5	8	11/6/81	17.59	28	6.8	2100	290	20-100 PPB TOLUENE DIMETHYL BENZENE ETHYL METHYL BENZENE TRI METHYL BEN- ZENE PROPIONYL BENZEN

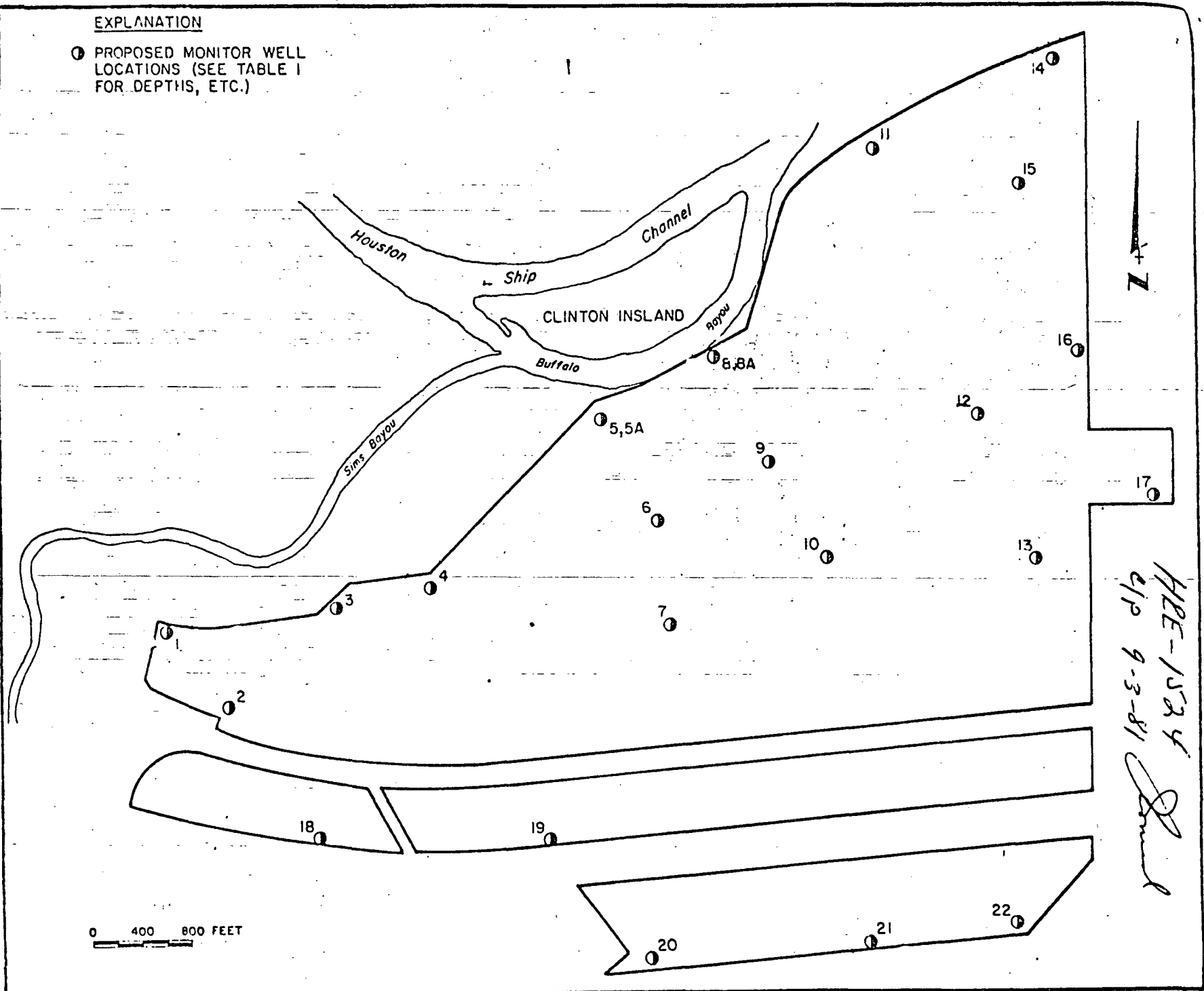


Figure 1. Proposed Monitor Well Locations, ARCO Refinery, Houston, Texas.

ATTACHMENT

## Attachment B

TABLE 1. PROPOSED MONITOR-WELL DEPTHS<sup>1/</sup>

Well Number	Size (in)	Estimated Depth (ft)	Estimated Screen Length (ft)
*1	4	30	5
2	4	30	5
3	4	30	5
4	4	25	10
*5	4	30	5
*5A	4	25	5
6*	2	25	20-25
7*	2	30	25-30
*8	4	20-25	5
*8A	4	45-50	5
9	2	25	20-25
10	2	60-70	60
*11	4	45	20-25
12*	2	20	15-20
13*	2	40	35-40
*14	4	45	20
*15	4	30	5
16	4	30-35	5
*17	4	25-30	10
*18	4	25-30	5
19	4	25-30	5
*20	4	30	5
21	4	30	5
*22	4	40	5

<sup>1/</sup> See Figure 1 for locations.

\* Temporary monitor well locations.

Last  
ATTACHMENT  
1-29-82